

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANGEL TORRES,)	08 C 0282
)	
Plaintiff,)	Judge Kendall
)	
vs.)	
)	Magistrate Judge Denlow
CITY OF CHICAGO, et al.,)	
)	
Defendants.)	

**AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF’S COMPLAINT**

Defendant City of Chicago (“City”), by its attorney, Mara S. Georges, Corporation Counsel, respectfully moves this court for an extension of time to answer or otherwise plead in response to Plaintiff’s complaint until March 21, 2008, and in support states:

1. Plaintiff filed his seven-count complaint on January 11, 2008. The complaint alleges federal claims under 42 U.S.C. § 1983 and Illinois state law claims against the City, two named Chicago police officers and two unknown Chicago Police officers.

2. Plaintiff’s complaint and summons were served on the City on or about January 14, 2008. Counsel for the City received the complaint on March 4, 2008, several weeks after the City was due to answer or plead in response to Plaintiff’s complaint.

3. Because of this delay in receiving the complaint, the City has not yet begun the process of investigating all of the allegations in the Plaintiff’s complaint and gathering and examining the pertinent records.

4. However, the Defendant Officers appeared on February 22, 2008, and this Court granted their motion for an extension of time to answer or plead to March 21, 2008.

Accordingly, the City requests until March 21, 2008, to answer or otherwise plead in response to the complaint.

5. As far as can be determined, this motion will not unduly burden the Court's management schedule. This request is made not to delay the proceedings, but rather to allow the City to respond properly to the allegations in Plaintiff's complaint.

6. Plaintiff's counsel has stated that he does not object to this motion.

WHEREFORE, the City respectfully requests this court to enter an order granting an extension to March 21, 2008, to answer or otherwise plead in response to Plaintiff's complaint.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the City of Chicago

By: /s/ Megan K. McGrath
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